

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

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MARC VEASEY, JANE HAMILTON, )  
SERGIO DELEON, FLOYD J. CARRIER, )  
ANNA BURNS, MICHAEL MONTEZ, )  
PENNY POPE, OSCAR ORTIZ, KOBY )  
OZIAS, JOHN MELLOR-CRUMLEY, PEGGY )  
HERMAN, EVELYN BRICKNER, GORDON )  
BENJAMIN, KEN GANDY, LEAGUE OF )  
UNITED LATIN AMERICAN CITIZENS )  
(LULAC), AND DALLAS COUNTY, TEXAS, )

*Plaintiffs,*

v.

RICK PERRY, Governor of Texas; and JOHN )  
STEEN, Texas Secretary of State, )

*Defendants.*

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UNITED STATES OF AMERICA, )

*Plaintiffs,*

TEXAS LEAGUE OF YOUNG VOTERS )  
EDUCATION FUND, IMANI CLARK, AND )  
MICHELLE BESSIAKE, )

*Plaintiff-Intervenors,*

TEXAS ASSOCIATION OF HISPANIC )  
COUNTY JUDGES AND COUNTY )  
COMMISSIONERS, HIDALGO COUNTY, )  
AND MARIA LONGORIA BENAVIDES, )

*Plaintiff-Intervenors,*

v.

STATE OF TEXAS, JOHN STEEN, in his )  
official capacity as Texas Secretary of State; )  
and STEVE McCRAW, in his official capacity )  
as Director of the Texas Department of Public )  
Safety, )

*Defendants.*

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CIVIL ACTION NO.

2:13-CV-193 (NGR)

[Lead case]

CIVIL ACTION NO.

2:13-CV-263 (NGR)

[Consolidated case]

TEXAS STATE CONFERENCE OF NAACP )  
 BRANCHES; and the MEXICAN )  
 AMERICAN LEGISLATIVE CAUCUS OF )  
 THE TEXAS HOUSE OF )  
 REPRESENTATIVES, )

*Plaintiffs,* )

v. )

JOHN STEEN, in his official capacity as )  
 Secretary of State of Texas; and STEVE )  
 McCRAW, in his official capacity as Director )  
 of the Texas Department of Public Safety, )

*Defendants.* )

CIVIL ACTION NO.  
 2:13-CV-291 (NGR)  
 [Consolidated case]

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BELINDA ORTIZ, LENARD TAYLOR, )  
 EULALIO MENDEZ JR., LIONEL )  
 ESTRADA; ESTELA GARCIA ESPINOSA, )  
 LYDIA LARA, MARGARITO MARTINEZ )  
 LARA, MAXIMINA MARTINEZ LARA, AND )  
 LA UNION DEL PUEBLO ENTERO, INC. )

*Plaintiffs,* )

v. )

STATE OF TEXAS, JOHN STEEN, in his )  
 official capacity as Texas Secretary of State; )  
 and STEVE McCRAW, in his official capacity )  
 as Director of the Texas Department of Public )  
 Safety, )

*Defendants.* )

CIVIL ACTION NO.  
 2:13-CV-348 (NGR)  
 [Consolidated case]

**DEFENDANTS' REQUEST FOR JUDICIAL NOTICE OF "A REVIEW OF  
 THE OPERATIONS OF THE VOTING SECTION  
 OF THE CIVIL RIGHTS DIVISION"**

Defendants respectfully request the Court take judicial notice of "A Review of the Operations of the Voting Section of the Civil Rights Division" (attached as Exhibit 1) under Federal Rule of Evidence 201(b). The Federal Rules allow courts to notice facts that are not subject to reasonable dispute because the facts "can be

accurately and readily determined from sources whose accuracy cannot reasonably be questioned.” FED R. EVID. 201(b)(2). Courts may take judicial notice of public records or government documents that come from reliable sources, including the internet. *Calop Bus. Sys., Inc. v. City of Los Angeles*, No. CV 12-07542, 2013 WL 6182627, at \*3 (C.D. Cal. Oct. 30, 2013). Courts have concluded that published reports of administrative bodies fall into the vein of public records. *See Pension Benefit Guar. Corp. v. White Consol. Indus., Inc.*, 998 F.2d 1192, 1197 (3rd Cir. 1993).

The document “A Review of the Operations of the Voting Section of the Civil Rights Division” (hereafter “The Review”) is a public record and its source can not be questioned. The Review was created by the Office of the Inspector General, an entity statutorily created to evaluate the efficiency and integrity of the Department of Justice programs and its personnel. <http://www.justice.gov/oig/about/>. The Review is publically available on the United State’s Department of Justice’s website at <http://www.justice.gov/oig/reports/2013/s1303.pdf>.

As a result, it is appropriate for this Court to take judicial notice of The Review.

Dated: May 9, 2014

Respectfully submitted,

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/s/ John B. Scott  
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COUNSEL FOR THE DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that on May 9, 2014, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ John B. Scott  
JOHN B. SCOTT